

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

PARENTS DEFENDING
EDUCATION,

Plaintiff,

v.

LINN-MAR COMMUNITY SCHOOL
DISTRICT; SHANNON BISGARD, in
his official capacity as Superintendent of
Linn-Mar Community School District;
BRITTANIA MOREY, CLARK
WEAVER, BARRY BUCHOLZ,
SONDRA NELSON, MATT
ROLLINGER, MELISSA WALKER,
and RACHEL WALL, in their official
capacities as members of the Linn Marr
Community School District School
Board,

Defendants.

Case No. _____

DECLARATION OF PARENT E

1. I live within the boundaries of the Linn-Mar Community School District (“Linn-Mar”) and am the parent of a school-aged child. I am married to Parent F.
2. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.
3. I am a member of Parents Defending Education.
4. I have a child enrolled in elementary school in Linn-Mar.

5. I have raised my child to believe that people are either male or female, and that “a boy cannot become a girl, or vice versa.” I have taught my child to be charitable to others but also to tell the truth and always stand up for their beliefs, even when those beliefs are unpopular.

6. Under the speech policy, however, my child can be disciplined for referring to another student according to their biological sex rather than their gender identity or for merely expressing discomfort about sharing bathrooms with teachers or students of the opposite biological sex.

7. I want my child to be educated in a challenging environment that involves the free exchange of ideas, and to be free to express their beliefs, even if others disagree with those beliefs or find them offensive. I do not want my child to be forced to affirm beliefs about gender identity that are inconsistent with their deeply held convictions.

8. I worry that being disciplined for stating their fundamental beliefs will inflict mental and psychological harm on my child by forcing my child to “choose” between expressing the beliefs they have been taught at home and following the instructions of teachers and other Linn-Mar authority figures.

9. My constant anxiety that my child will be subjected to this harm has, in turn, caused me emotional and psychological harm.

10. I am signing this declaration under a pseudonym because I live in Linn-Mar and, if my participation in this litigation becomes public, I fear reprisal from school

officials, my child's teachers and fellow students, and members of the broader community.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 16 day of July, 2022

Parent E
Parent E